

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 22-mj-02070-Louis

UNITED STATES OF AMERICA

vs.

RODOLPHE JAAR,

Defendant.

**RESPONSE TO DEFENDANT'S UNOPPOSED MOTION
REQUESTING A CONTINUANCE**

NOW COMES the United States of America, by and through its undersigned attorney, and respectfully responds to the Defendant's motion requesting a 60-day continuance of his arraignment. The Defendant correctly stated that the government does not oppose the request. The purpose of this response is to clarify the government's position in support of the Defendant's motion.

1. The Defendant was charged via complaint with Providing Material Support Resulting in Death, in violation of Title 18, U.S.C., Section 2339A, and participating in a Conspiracy to Kill or Kidnap outside the United States, in violation of Title 18, U.S.C., Section 956(a)(1). Arraignment of the Defendant is presently set for February 25, 2022, but the Defendant has requested a continuance of 60 days for arraignment.
2. The Defendant's motion accurately states that the government does not oppose the request and the parties have been in regular communication since the Defendant's arrest and since the current defense counsel has begun representation of this Defendant. The Defendant's request and the government's lack of opposition does not signify that the

case is standing still or otherwise being delayed. The government has started the process of informally providing discovery to the Defendant.

3. However, the Defendant correctly notes that this case is complex and, just as the Defendant requests additional time to prepare his defense, the government too would benefit from additional time to assure that it has been complete in its gathering of evidence and can accurately present the facts that will ultimately result in this Defendant's indictment.
4. Therefore, the government respectfully submits this response to effectively join the Defendant's request for a continuance, now providing additional information which the parties hope will allow the Court to find that there is good cause to continue the arraignment as requested initially by the Defendant.
5. In conclusion, the government respectfully submits there is good cause to continue the arraignment, that such continuance does not constitute unnecessary delay and outweighs the Defendant's and the corresponding public's right to a speedy indictment.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

BY: /s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I filed the foregoing document with the Clerk of the Court and served copies to defendant via ECF on February 24, 2022.

/s/
Walter M. Norkin
Assistant United States Attorney